

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

Master File 06-MD-1775 (JG) (VVP)

ALL CASES

**PLAINTIFFS' NOTICE OF MOTION TO AUTHORIZE
DISTRIBUTION OF LUFTHANSA SETTLEMENT FUND
TO CLAIMANTS AND REIMBURSEMENT OF EXPENSE**

PLEASE TAKE NOTICE THAT, upon the Declaration of Lance P. Blair Regarding Lufthansa Settlement Claim Administration, dated July 18, 2011 ("Blair Declaration"), along with its supporting exhibits, the Declaration of Hollis Salzman Regarding Litigation Expenses, dated July 19, 2011, and the Memorandum in Support of Plaintiffs' Motion to Authorize Distribution of Lufthansa Settlement Fund to Claimants, dated July 19, 2011, and all other papers and proceedings herein, Plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable John Gleeson, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to enter an order authorizing the distribution of the Lufthansa settlement funds in accordance with Exhibit 3 to the Blair Declaration and for reimbursement of payment to the Special Master for certain unreimbursed expenses related to the recommendation of allocation of the Lufthansa Settlement Fund among Settlement Class members.

Oral argument on this motion, if any, will be held on a date and time set by the Court.

Dated: July 19, 2011

Robert N. Kaplan (RK-3100)
Gregory K. Arenson (GA-2426)
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022
(212) 687-1980

Gary L. Specks (GS-8767)
KAPLAN FOX & KILSHEIMER LLP
423 Sumac Road
Highland Park, IL 60035
(847) 831-1585
Co-Lead Counsel

By: /s/ Robert N. Kaplan

Howard J. Sedran
Austin B. Cohen
LEVIN, FISHBEIN, SEDRAN & BERMAN
510 Walnut Street
Philadelphia, PA 19106
(215) 592-1500
Co-Lead Counsel

By: /s/ Howard J. Sedran

Respectfully Submitted,

Hollis Salzman (HS-5994)
Jay L. Himes (JH-7714)
Gregory S. Asciolla (GA-2222)
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
(212) 907-0700
Co-Lead Counsel

By: /s/ Hollis Salzman

Michael D. Hausfeld
William P. Butterfield
Brent W. Landau
HAUSFELD LLP
1700 K Street, N.W., Suite 650
Washington, DC 20006
(202) 540-7200
Co-Lead Counsel

By: /s/ Michael D. Hausfeld

Steven N. Williams
COTCHETTE, PITRE & MCCARTHY
840 Malcolm Road, Suite 200
Burlingame, CA 94010
(650) 697-6000
U.S. Indirect Purchaser Counsel

By: /s/ Steven N. Williams

W. Joseph Bruckner
LOCKRIDGE, GRINDAL NAUEN P.L.L.P
100 Washington Avenue South
Minneapolis, MN 55401
(612) 339-6900
U.S. Indirect Purchaser Counsel

By: /s/ W. Joseph Bruckner

Christopher Lovell
LOVELL STEWART HALEBIAN
JACOBSON LLP
61 Broadway, Suite 501
New York, NY 10006
(212) 608-1900
U.S. Indirect Purchaser Counsel

By: /s/ Christopher Lovell

Craig C. Corbitt
ZELLE, HOFMANN, VOELBEL, MASON &
GETTE LLP
44 Montgomery Street, Suite 3400
San Francisco, CA 94104
(415) 693-0700
U.S. Indirect Purchaser Counsel

By: /s/ Craig C. Corbitt